## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DISH NETWORK L.L.C.,	§	
	§	
Plaintiff,	§	Case No. 4:20-cv-1678
	§	
V.	8	
	§	
YAHYA ALGHAFIR, TEXAS	§	
COMMUNICATION & TECHNOLOGY	§	
LLC, SHENZHEN JIEMAO	8	
TECHNOLOGY CO., LTD., and	§	
SHENZHEN STREET CAT	§	
TECHNOLOGY CO., LTD., individually	§	
and together d/b/a Super Arab IPTV,	8	
,	8	
Defendants.	§	

## UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD

TO THE HONORABLE DAVID HITNER, UNITED STATES DISTRICT JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, Samer Al-Azem and The Azem Firm (collectively "Counsel"), attorneys for Shenzhen Jiemao Technology Co. Ltd. ("Jiemao") in the instant matter, and present this Unopposed Motion to Withdraw as Counsel of Record, and would show unto the Court the following:

Counsel field an appearance in this matter on October 5, 2021. However, since filing said appearance, Counsel has had serious difficulties communicating with Jiemao, which render any continued representation of Jiemao by Counsel to be extremely challenging, at best. In fact, due to such difficulties, fundamental disagreements between Jiemao and Counsel exist as to the prosecution of this matter. Counsel stands ready to proffer all communication attempts with

Jiemao and the problems relating to that representation on an *in camera* basis if it were to please

the Court.

Although Jiemao has not yet selected a substitute attorney, Counsel has Jiemao's

assurance that it will be doing so in just a few days.

There is only one deadline currently pending in the case, which is the filing of a joint

pretrial order by February 1, 2022. The case is not set for trial until the May/June 2022 trial

term.

For these reasons, Samer Al-Azem and The Azem Firm respectfully request that the Court

grant them permission to withdraw as counsel of record for Shenzhen Jiemao Technology Co.,

Ltd.

Respectfully submitted, this 31st day of January, 2022

The Azem Firm

/s/ Samer Al-Azem

Samer Al-Azem

Texas State Bar No. 00793240

Southern District of Texas Bar No. 19825

2808 Virginia Street,

Houston, Texas 77098

(713) 305-6162 (telephone)

(281) 962-6576 (facsimile)

E-mail: <u>s.alazem@azemlaw.com</u>

ATTORNEY FOR DEFENDANT

SHENZHEN JIEMAO TECHNOLOGY CO. LTD.

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**CERTIFICATE OF CONFERENCE** 

The undersigned counsel hereby certifies that he has conferred with the attorney-in-

charge for DISH Network, LLC in this matter and that said attorney has indicated that he does

not oppose this motion. However, the attorney-in-charge for DISH Network, LLC had requested

an indication that Jiemao (1) does not intend to participate in the pretrial order or conference,

(2) does not intend to hire replacement counsel, and (3) does not intend to participate in a trial.

Since the deadline for the filing of the joint pretrial order is the day following the filing of this

motion (February 1, 2022), unless the Court allows Counsel to not participate in the pretrial

order, which is very much Counsel's preference, Counsel will endeavor to cooperate with

counsel for DISH Network, LLC to jointly file such order. However, Counsel cannot represent

that Jiemao does not intend to participate in a trial since Jiemao is currently actively seeking an

attorney who can substitute in for Counsel.

**CERTIFICATE OF SERVICE** 

I certify that, contemporaneously with filing, a copy of the foregoing Motion to Withdraw

as Counsel of Record was served by Notification of Electronic Filing by the Court's CM/ECF

system and a courtesy copy of same has been forward to opposing counsel of record.

/s/ Samer Al-Azem

Samer Al-Azem

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2808 Virginia Street,

Houston, Texas 77098

(713) 305-6162 (telephone)

(281) 962-6576 (facsimile)

E-mail: s.alazem@azemlaw.com

ATTORNEY FOR DEFENDANT SHENZHEN JIEMAO TECHNOLOGY CO. LTD.

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